

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

**RAYMOND JAMES & ASSOCIATES, INC.,)
Plaintiff,)
v.)
50 NORTH FRONT ST. TN, LLC,)
Defendant.)**

No. 2:18-cv-02104-JTF-tmp

**JOINT MOTION AND MEMORANDUM IN SUPPORT FOR EXTENSION OF TIME
TO FILE JOINT REPORT REGARDING MOTIONS TO COMPEL**

COME NOW the Plaintiff, Raymond James & Associates, Inc. (“Raymond James”) and Defendant (“50 North Front St. TN, LLC”), and jointly request the Court to extend the deadline for the filing of the Joint Report ordered by Magistrate Judge Pham on June 26, 2019. The purpose of this report is to update the Court concerning the results of the in-person meet-and-confer meetings between the parties’ counsel concerning Landlord’s two pending Motions to Compel (ECF No. 202 and ECF No. 203) and Plaintiff’s Supplemental Motion to Compel (ECF No. 237). The current deadline for filing the Joint Report is Monday, July 22, 2019. (ECF No. 257)

The parties have had multiple in-person meetings and have come to resolutions on numerous discovery requests. Further requests, however, are still at issue and the parties believe that the additional time requested will help them in resolving or at least narrowing the issues. The parties therefore respectfully request that the deadline for filing the Joint Report be extended to and through Friday, July 26, 2019.

Respectfully submitted,

THE PROSSER LAW FIRM

/s/ Kyle Johnson
Niel Prosser (BPR No. 11647)
Rob Clapper (BPR No. 34180)
Kyle Johnson (BPR No. 36066)
5865 Ridgeway Center Parkway, Suite 300
Memphis, TN 38120
T: (901) 820-4433
E: np@prosserlaw.com
clapper@prosserlaw.com
kjohnson@prosserlaw.com

- and -

BURCH, PORTER & JOHNSON, PLLC

/s/ Gary Scott Peeples
Melissa A. Maravich (BPR No. 13876)
Gary Scott Peeples (BPR No. 32303)
130 North Court Avenue
Memphis, TN 38103
T: (901) 524-5000
F: (901) 524-5024
E: mmaravich@bpjlaw.com
gpeeples@bpjlaw.com

Counsel for Plaintiff

**BLACK MCLAREN JONES RYLAND
AND GRIFFEE, P.C.**

/s/ Michael G. McLaren

Michael G. McLaren (#5100)
John C. Ryland (#16878)
Christopher M. Williams (#36256)
530 Oak Court Drive, Suite 360

Memphis, Tennessee 38117
(901) 762-0535
(901) 762-0539 – fax
mmclaren@blackmclaw.com
jryland@blackmclaw.com
cwilliams@blackmclaw.com

Attorneys for Defendant

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document was filed using the Court's CM/ECF system on July 19, 2019 which will automatically send an electronic copy of the filing to all counsel of record in this case.

/s/ Kyle Johnson